

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Global Printing Equipment, Inc.,	:	
	:	
Plaintiff	:	Civil Action
	:	No. 08-cv-03120
vs.	:	
	:	
Knights Complete Printing Solutions, Inc.	:	
	:	
Defendant.	:	
	:	

**DEFENDANT'S MOTION TO VACATE DEFAULT AND FOR  
LEAVE TO PLEAD TO COMPLAINT**

Defendant, KNIGHTS COMPLETE PRINTING SOLUTIONS, INC. (Knights), by and through its attorney, Arnold H. Landis, requests this Honorable Court enter an order vacating the order of default entered against it on July 23, 2008. In support of their motion, movant states as follows:

1. On July 23, 2008 this court entered an order of default against Knights and set the matter for prove up on August 20, 2008.
2. The order of default should be vacated and Knights should be granted leave to file its response to the complaint.
3. Knights actively defended this case when it was filed by plaintiff in the United States District Court in Pennsylvania, Global Printing Equipment, Inc v. Knights Complete Printing Solutions, Inc., Case No. 07 C 5385.
4. Knights moved to dismiss or transfer the case to the Northern District of Illinois.
5. Knights was not aware of the July 23, 2008 court date at which the default was entered against it.

6. Knights has a meritorious defense to the complaint.

7. Knights' attorney advised the attorney for Global Printing Equipment, Inc. that this motion would be filed and movant believes that plaintiff has no objection to the relief sought in this motion.

8. For the foregoing reasons, movant asks the court for an order vacating the order of default and granting defendant fourteen (14) days to answer or plead to the complaint.

Respectfully submitted,  
Knights Complete Printing Solutions, Inc.

By:\_\_\_\_/s/\_\_\_\_\_  
Arnold H. Landis, its attorney

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